

October 15, 2004

Ms. Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Unbundled Access to Network Elements –
CC Docket No. 01-338 and WC Docket No. 04-313

Ex parte presentation pursuant to C.F.R. §1.1206(a)(1)

Dear Ms. Dortch:

CIENA Corporation (“CIENA”) met yesterday with the following members of the Wireline Competition Bureau staff: Jeremy Miller, Ian Dillner, Tim Stelzig, Carol Simpson, Chris Canter, Russ Hanser and Cathy Zima. Representing CIENA were Doug Cooper and myself. During the meeting, CIENA reiterated its request, as set forth in its initial comments in this proceeding, that the Commission not retreat from its policy of reducing or eliminating unbundling of broadband facilities and services. The removal of the previous requirements and elimination of much of the uncertainty surrounding broadband unbundling has helped spur deployment of advanced services in the United States. In keeping with that philosophy, CIENA also indicated that reinstatement of line sharing was unnecessary, inefficient, and likely to re-create uncertainty, which will stifle new investment. Finally, CIENA expressed its opinion that, in order to facilitate conversion to UNE-L (from UNE-P) for residential markets, the Commission must establish clear guidelines that will allow competitors serving residential markets to transition to facilities-based deployment of voice and data equipment. CIENA indicated that its products at present can (and do) support UNE-L entry by competitive carriers.

Respectfully submitted,

/s/
Stephen L. Goodman
Counsel for CIENA Corporation